

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WALTER BECK CORPORATION d/b/a THE)	CIVIL DIVISION
RAINBOW INN,)	
)	Civil Action No. 04-348 - Erie
Plaintiff,)	
vs.)	JUDGE MAURICE B. COHILL, JR.
)	
SAFECO CORPORATION, AMERICAN)	
ECONOMY INSURANCE COMPANY, and)	<u>ELECTRONICALLY FILED</u>
AMERICAN STATES INSURANCE)	
COMPANY,)	
)	
Defendants.)	

AFFIDAVIT OF TANYA AIELLO

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF MCKEAN)

Before me, a Notary Public, personally appeared Tanya Aiello, who being duly sworn,
deposes and says as follows:

1. My name is Tanya Aiello, an adult individual residing in the Commonwealth of Pennsylvania. I state that the facts contained in the within Affidavit are based upon my own knowledge and personal information.

2. I was employed by the Walter Beck Corporation, doing business as The Rainbow Inn ("The Rainbow Inn"), from approximately 1995 until the time it ceased operations due to the December 5, 2003 fire ("the Fire").

3. I worked at The Rainbow Inn in various capacities (bartender, waitress, etc.) and would fill in on an as-needed, part-time basis.

4. While working at The Rainbow Inn, I observed a fire suppression system in place, which I understood to be operational. Specifically, I recall seeing various nozzles under the

hood in the kitchen that would be activated in the case of a fire. I also know that the fire suppression system was in place because I was advised that it was tied in with the alarm system in place at The Rainbow Inn. This was told to me because I would often times be responsible for locking the place up at closing time.

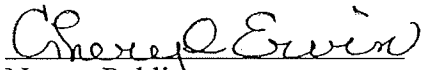
5. I state that if called to testify under oath in the above-captioned matter, I would testify to the facts and opinions set forth in the within Affidavit.

6. The facts set forth herein are true and correct of my own knowledge and personal information.

Nothing sayeth the Affiant further.


TANYA AIELLO

Sworn and subscribed to
before me this 12 day of
May, 2006.


Notary Public

